

## Remarks

### **The amendment to claim 187**

The amendment merely provides the required plural antecedent. The claim as amended  
 5 remains fully supported by the Specification as filed.

### **The rejection of claim 187 under 35 U.S.C. 112, first paragraph**

The amendment provides the required plural antecedent and thereby overcomes the  
 portion of the rejection which is based upon the lack of the antecedent. Applicant is  
 10 traversing the portion of the rejection which is based on the use of “perceive” in the  
 claim.

Examiner grounds the rejection as follows: “The term ‘to perceive’ . . . is a relative term  
 which renders the claim indefinite.” *to perceive* is defined in Webster’s New Collegiate  
 15 Dictionary, G& C. Merriam Co., 1977 as follows:

1: To attain awareness or understanding of    2: to become aware of  
 through the senses

As Examiner will immediately see from the definition, *to perceive* is no more “relative”  
 20 than Examiner’s suggested replacement, “to view”. The definition of *to perceive*  
 includes “to view”, but is broader, since it includes the use of other means of perception  
 such as touch or sound in the user interface. Use of such other means of perception in  
 user interfaces is of course well known. Because the term *perceive* is not a “relative  
 term”, its use does not render the claim indefinite and Applicant respectfully declines to  
 25 amend the term.

### **The rejections under 35 U.S.C. 103**

The Board and Zimmerman references upon which these rejections are based describe  
 various project scheduling systems that are prior art with regard to Applicant’s invention.  
 30 The Board reference is a comparison of five different project scheduling systems.  
 Examiner finds that the Board reference discloses all of the limitations of Applicant’s

claim 187 except “the representations of model entities belonging to hierarchies including a hierarchy and/or another hierarchy”. Examiner believes that he has found this limitation in the Zimmerman reference, which describes Open Plan, one of the systems that are compared in the Board reference, in more detail. The cited location in

5 Zimmerman reads as follows:

Open Plan now supports hierarchical structures for activities, codes (work breakdown structure and organizational breakdown structure), and resources . . . Unfortunately, if a schedule is hierarchical, it cannot be accessed in ‘Project Executive,’ Open Plan’s interactive graphical presentation mode. (Zimmerman full text, paragraph 4)

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If the “activities, codes, and resources” are taken to be the claim’s “model entities”, what Zimmerman sets forth is that each of these “model entities” may belong to a hierarchical structure for its particular kind of entity; Zimmerman does not set forth or imply that an Open Plan “activity”, “code”, or “resource” that belongs to a hierarchy can simultaneously belong to another hierarchy, which is what the cited limitation in Applicant’s claim requires. Consequently, Examiner has not made his *prima facie* case of obviousness with regard to claim 187 and the claim is patentable over the references.

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20 Further, the last sentence of the cited location suggests that Open Plan also does not disclose the limitation,

the interface permitting a person to perceive and modify the model entities and the hierarchies and to perceive and modify the information to which the model entities provide access

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It is moreover unclear from “Board to what extent the other project planning systems disclose this limitation.

#### **Patentability of the dependent claims**

30 Claims 188-197 are dependent from claim 187 and are consequently patentable because claim 187 is patentable. Additionally, the cited references often do not disclose the limitation added by the dependent claim; consequently, many of the dependent claims are patentable in their own rights over the references.

Beginning with claim 188, the added limitation is

the system further permits a person to sort model entities according to the entities' hierarchy membership.

- 5 Broad indicates at page 66, column 2, bottom, that in Open Plan, “sort and selection options make it easy to present projects in detail”; this does not imply that “model entities” may be sorted by “hierarchy membership”, as required by claim 188, and claim 188 is thus patentable in its own right.
- 10 Claims 192-196 are directed to the limitation that Applicants’ “representations of model entities” include “representations of further information” such as documents, messages, and discussions and “permit the person to perceive how the further information is related to the model entities and to access the related further information”. Examiner rejects claim 192 on the basis of Board’s “fragnets”, which are fragments of planning networks
- 15 which can be saved in libraries for later use. The fragnets may contain representations of model entities, but are not themselves included in model entities. The reference thus does not disclose the added limitation of claim 192. As for claim 193, it is unclear what the “superimposed data entry form” receives data for. Nothing in Board indicates that it receives data that is used to for “the related further information” that is accessed via the
- 20 “representations of further information” in the representations of model entities”, as required by the claim.

- Regarding claims 194-196, Examiner points out that at least some of the scheduling systems include provisions for email and a project bulletin board. This rejection only
- 25 points up the difference between the Board systems and what Applicants are claiming here. The point here is that as set forth in claim 192, the interface “permit the person to perceive how the further information is related to the model entities and to access the related further information”, i.e., the documents, items of email, and discussions are related to and accessible via the model entities. Thus, to see all of the email
- 30 correspondence relating to a given model entity, one selects the model entity instead of going to the email component of the scheduling system and looking for email about the given model entity there.

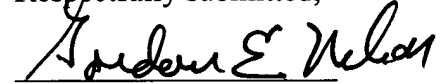
**Claims 198-210**

As Examiner understands, these are claims directed to Applicant's invention in its aspect as a "method of supporting management of a business" and these claims are patentable over the references for the same reasons that claims 187-196 are patentable over the references.

**Conclusion**

Applicant has amended claim 187 to overcome one of the grounds for rejection of that claim under 35 U.S.C. 112, first paragraph and has traversed the other ground for rejection. Applicant has further traversed the rejections under 35 U.S.C. 103. Applicant has thus been completely responsive to Examiner's Office action of 12/14/05 as required by 37 C.F.R. 1.111(b) and respectfully requests that Examiner continue with his examination and allow the claims as amended, as provided by 37 C.F.R. 1.111(a). No fees are believed to be required by way of the amendment. If any should be, please charge them to deposit account number 501315.

Respectfully submitted,



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